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7 *Attorneys for Plaintiff*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 SCOTT FREEMAN, M.D., as trustee
11 for the SCOTT MITCHELL FREEMAN
REVOCABLE LIVING TRUST, dated
March 10, 2012, for itself and as
assignee of FERDINAND BELGA;

13 Plaintiff,

14 *vs.*

15 STEPHEN HURST; SUNRAY ASSET
MANAGEMENT, INC.; NICO FORTE;
16 CERUVIA LIFESCIENCES f/k/a CH TAC,
LLC f/k/a SAVANT TAC, LLC; CAREY
17 TURNBULL; RUSSELL BURBANK, as
liquidating trustee for nominal
defendants SAVANT ADDICTION
MEDICINE, LLC and SAVANT HWP
19 HOLDINGS, LLC; DOE INDIVIDUALS 1
through 20; and ROE CORPORATIONS 1
through 20,

21 Defendants,

22 *and*

23 SAVANT ADDICTION MEDICINE, LLC;
SAVANT HWP HOLDINGS, LLC; and
24 SAVANT HWP, INC.

25 Nominal Defendants.

Case No. 2:22-cv-01433-RFB-VCF

STIPULATED MOTION AND ORDER
TO EXTEND DEADLINE:

- (1) TO AMEND COMPLAINT (FIRST REQUEST)**
- (2) TO RESPOND TO COUNTERCLAIM (ECF NO. 7) (FIRST REQUEST)**
- (3) TO RESPOND TO MOTION TO DISMISS OR FOR MORE DEFINITE STATEMENT (ECF NO. 6) (SECOND REQUEST)**
- (4) FOR DEFENDANTS TO RESPOND TO COMPLAINT (FIRST REQUEST)**

The parties hereby stipulate and agree to extend the case deadlines as follows:

1. A 21-day extension, through Friday, October 21, 2022, for Scott Freeman, M.D., as trustee for the Scott Mitchell Freeman Revocable Living Trust, dated March 10, 2012, for itself and as assignee of Ferdinand Belga (“plaintiff”) to amend his complaint. This is the first request to extend this deadline.

2. A 10-day extension, through Friday, October 21, 2022, for plaintiff to respond to defendant Stephen Hurst's counterclaims for damages (ECF No. 7). This is the first request to extend this deadline.

3. A 21-day extension, through Friday, October 21, 2022, for plaintiff to respond to defendants Sunray Asset Management, Inc., Savant HWP, Inc., and Nico Forte's motion to dismiss or for more definite statement (ECF No. 6). This is the second request to extend this deadline.

4. An extension through November 21, 2022, for defendants to respond to the complaint and to amend counterclaims. This is the first request to extend this deadline.

There is good cause for this extension. Plaintiff's counsel has been engaged in simultaneous state-court jury trials—lead counsel in a trial in Las Vegas, and other counsel in a trial in Reno. This has detracted from counsel's ability to complete the amended complaint. Plaintiff's counsel will work diligently during the extension period and will continue to accommodate reasonable requests from opposing counsel.

IT IS SO ORDERED:

8

RICHARD F. BOULWARE, II
United States District Judge

DATED this 9th day of October, 2022.

1 Dated this 30th day of September, 2022.

2 LEWIS ROCA
3 ROTHGERBER CHRISTIE LLP

4 By: /s/ Abraham G. Smith
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13 Hurst, Sunray Asset Management,
14 Inc., Savant HWP Holdings, Inc. and
15 Nico Forte

16 SANTORO WHITMIRE

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sell Burbank, as liquidating
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Savant Addiction Medicine,
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26 TROUTMAN PEPPER
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29 Attorney for Nominal Defend-
ants Savant Addiction Medicine
LLC and Savant HWP Hold-
ings, LLC

30 IT IS ORDERED.

31 _____
32 UNITED STATES DISTRICT JUDGE

33 DATED: _____